

Hon. Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ESTHER HOFFMAN; SARAH DOUGLASS,
ANTHONY KIM; and IL KIM, and DARIA
KIM, on behalf of themselves and on behalf of
others similarly situated,

Plaintiffs,

v.

TRANSWORLD SYSTEMS INC., et al.,

Defendants.

NO. 2:18-cv-1132-TSZ

STIPULATED MOTION TO EXTEND
DEADLINE TO FILE REPLY IN
SUPPORT OF MOTION TO STRIKE

Noted Date: October 23, 2020

Defendant, Transworld Systems Inc. ("TSI"), through undersigned counsel and pursuant to LCR 7(j), requests a short 3-day extension to reply in support of the motion to strike portions of the Second Amended Complaint, docket no. 76 (the "Motion") filed by TSI, Patenaude & Felix, A.P.C., and Matthew Cheung (hereinafter "defendants"), and, in support thereof, shows the following:

1. The Motion was filed on September 11, 2020 and is noted for October 23, 2020.
2. Plaintiffs filed their opposition to the Motion on October 19, 2020, and defendants' reply is due October 23, 2020.

STIPULATED MOTION TO EXTEND DEADLINE TO
FILE REPLY IN SUPPORT OF MOTION TO STRIKE
[2:18-cv-1132-TSZ] - 1

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1 3. Defendants believe their reply to the arguments asserted in opposition will assist
2 the Court in reaching its conclusion on the Motion.

3 4. The undersigned was diligent in preparing defendants' reply, but discovered on the
4 morning of October 23rd that due to file server issues, the document was not saved to the disk and
5 the data was lost. The undersigned realized the document was not properly saved this morning
6 when we were preparing it for filing.

7 5. The undersigned promptly sought all parties' concurrence or stipulation to the relief
8 requested herein, and the parties have since stipulated to the filing of this motion.

9 For the foregoing reasons, Transworld Systems Inc. respectfully requests the Court extend
10 for 3 days (*i.e.*, Monday, October 26, 2020) the deadline for defendants to reply in support of
11 defendants' motion to strike.

12 Dated this 23rd day of October, 2020.

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14 By s/ Justin H. Homes

SESSIONS FISHMAN, NATHAN & ISRAEL
Justin H. Homes, Esq. (*pro hac vice*)
James K. Schultz (*pro hac vice*)
Bryan C. Shartle, Esq. (*pro hac vice*)

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17 By s/ Stephen G. Skinner

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21 Attorneys for Transworld Systems Inc. and
22 NCSLT Defendants

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

By s/ Stephen G. Skinner

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Incorporated, National Collegiate Student Loan

Trust Defendants, and National Collegiate Master

Student Loan Trust